

Official Comments Regarding the 10/07 Draft Supplemental Environmental Impact Statement for Yucca Mountain

Pertaining to the Draft Repository SEIS:
Site Characteristics

- 1 [The SEIS states that the site is isolated from concentrations of human population and activity. However, Pahrump and Las Vegas Nevada are among the fastest growing populations in the U.S. Downstream from the site, groundwater is used for drinking, irrigation, and the largest dairy in the Nevada, supplying thousands of children with milk. Seventeen miles away, California hosts 1.4 million tourists a year going to Death Valley. Seven tributaries flow down Yucca Mountain to the underground Amargosa River, said by some to be the longest and biggest in the world. The Amargosa empties into Death Valley, after flowing right through a number of towns. Flash floods are frequent, and can close roads for days. Though the groundwater beneath Yucca Mountain may flow into a "closed" hydrogeologic basin, this basin covers thousands of square miles, and many communities depend on this groundwater for survival. Research conducted by Inyo County, CA, defines fast pathways from Yucca Mt. to area springs used for drinking water by many.] 2
- 3 [The SEIS reports that the site is on land controlled by the Federal Government, but it is located on lands belong to the Western Shoshone nation by treaty, and the U.S. Government cannot provide proof of title, even when requested by international courts.]

Regarding the Transportation, Aging and Disposal (TAD) Canisters

- 4 [The draft SEIS contains no final TAD designs, so the impacts of the TADs on the repository and transportation systems cannot be assessed. As there is no rail access at Yucca Mountain, and no guarantee that there will be in the future, the SEIS should have assessed the impacts of a transportation system that use another primary mode of transportation to Yucca. TAD containers are not compatible with systems already in place in many reactor sites, and the SEIS needs to contain a comprehensive assessment of the risks and impacts to workers, facilities, and communities where handling or repackaging operations would take place. Many utilities have specific problems with use of the proposed TAD system at specific reactor sites, and DOE offers no meaningful alternative to the TAD system.]

Regarding the Draft Rail Alignment SEIS:

- 5 [The draft Rail EIS includes the Mina Rail Corridor as a "non-preferred alternative." However, this is not a viable alternative, as required by NEPA, given that the Walker River Paiute Tribe has refused permission for the DOE to use any portion of its reservation for the proposed rail spur.]
- 6 [The repository SEIS should have evaluated the impacts of a legal-weight truck transport system nationwide and within Nevada.]
- 7 [The DSEIS does not adequately address transportation and safety issues, such as worst case accidents - such combinations of factors that are "not reasonably foreseeable".]
- 8 [It underestimates the consequences of severe accidents involving long duration fires, terrorist attack, and the potential for human error.]
- 9 [Because the DOE has announced that the rail line it proposes would be a "Shared Use" line, the USDOT Surface Transportation Board should be the lead agency that prepares the Rail Alignment EIS.] [The DOE contention that the non-rail shipments would be made by over-weight trucks is unsubstantiated, as the impact of the used of over-weight trucks in Nevada and elsewhere are not analyzed.] 10

Please keep me updated on all developments requiring public input.

Sincerely,

Rodger Searles

Rodger Searles

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Dear Ms. Summerson and Mr. Bishop,

In preparing my response to the U.S. Department of Energy's (DOE) draft Repository Supplemental Environmental Impact Statement (SEIS) and draft Nevada Rail Corridor/Alignment Environmental Impact Statement, I have identified several issues regarding both documents that should be addressed by the DOE in the course of developing both Final Environmental Impact Statements (EIS).

1 [Using the Yucca Mountain site to 'dispose' of nuclear waste is a very risky and therefore an unexceptable choice as a nuclear waste repository. Geological fault lines that run through and near the Yucca Mountain area. Yucca Mountain is extremely unstable to be used as a site for nuclear storage with the unpredictable weather and geological changes that are expected in that area.]

2 [Yucca Mountain has been and continues to be a sacred and beloved site for thousands of years to the local Native American tribes. The Timbisha tribe and other Western Shoshone tribes have conducted spring renewal ceremonies on Yucca Mountain for an unknown time, and continue to do so into the present on the western portion they are still able to access. The SEIS also fails to mention the ongoing dispute and litigation involving the United States' violation of the 1863 Treaty of Ruby Valley with the Western Shoshone which clearly defines territorial borders for their nation of Newe Sogobia as well outside the proposed land withdrawal. This treaty was fully ratified by Congress, and is legally "the supreme law of the land". In April of 2004, the United Nation's Committee to End Racial Discrimination upheld the Shoshone claim in a record decision, and their declaration clearly identifies the Yucca Mountain Repository as one of several ongoing serious human rights violations by the United States against the Western Shoshone Nation.]

cont [There are serious risks associated with the 'disposing' and transportation of nuclear waste. One of the most deadly waste materials on earth, nuclear waste should be stored on-site, in retrievable casks, and not transported across the country. There is an extremely high likelihood that there will be adverse impacts to the drinking water supply, impacts from truck transport of nuclear waste, socio-economic impacts, impacts to cultural resources, and environmental justice issues.

A nuclear waste repository at Yucca Mountain creates a false sense of security for using nuclear energy while we should be focusing on alternative renewable energy sources.

Overall, the research on this site clearly shows that storing nuclear waste in this area is not safe or ethical and I do not wish to see this project carried out. For these and other reasons, Yucca Mountain is unacceptable as a nuclear waste repository.]